

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

<b>In re Terrorist Attacks on September 11, 2001</b>	<b>03 MDL 1570 (GBD)(SN) ECF Case</b>
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**This document also relates to member case:**

***Marie Laure Anaya, et al. v. Islamic Republic of Iran, 1:18-cv-12341 (GBD) (SN)***

I, PATRICK JOSEPH DONAHUE, declare, pursuant to 28 U.S.C. Section 1746, as follows:

1. I am associated with The Donahue Law Firm, one of four law firms representing the Plaintiffs in the above-captioned *Marie Laure Anaya, et al. v. Islamic Republic of Iran, 1:18-cv-12341-GBD-SN* (the “*Anaya Action*”). I was admitted *pro hac vice* in the *Anaya Action* on January 15, 2019. I submit this Declaration in support of Plaintiffs’ motion to correct Plaintiffs’ First Amended Short Form Complaint filed on February 22, 2019 (ECF No. 29<sup>1</sup>) (the “FAC”) to correctly reflect the name of Plaintiff Jasmine Jackman, and for related relief.

2. Ms. Jackman is the stepdaughter of the late Michael W. Lowe who was killed in the collapse of the World Trade Center on September 11, 2001. In the FAC, Ms. Jackman is incorrectly identified by her birth name, Jasmine Lanham. *See* ECF No. 29-1 at Line 75.

3. In the course of preparing a motion for entry of default judgments for solatium damages for Ms. Jackman and her two siblings, I learned for the first time that, at the time the FAC was filed, Ms. Jackman was married and using her married name, Jackman, not her birth name. Ms. Jackman continues to be known by her married name. Annexed hereto as Exhibit 1

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<sup>1</sup> Unless otherwise noted, ECF citations are to the docket for the *Anaya Action, 1:18-cv-12341-GBD-SN*.

is Ms. Jackman's Declaration of Family Relationship, executed on August 12, 2022, in which she states that her name is Jasmine Jackman and that Jasmine Lanham was her maiden name.

See Exhibit 1 at ¶ 1.

4. Plaintiffs respectfully seek leave to amend the FAC and the case caption to correctly reflect Ms. Jackman's name, prefatory to moving for an award of solatium damages for Ms. Jackman on the grounds that the late Michael W. Lowe, who married Ms. Jackman's mother in 1993 when Ms. Jackman was less than three years old, was the "functional equivalent" of a biological father to Ms. Jackman.

I declare under penalty of perjury that the foregoing is true and correct. Executed in Annapolis, Maryland on October 20, 2022.

  
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PATRICK JOSEPH DONAHUE